

1 CRABTREE SCHMIDT  
Michael R. Dennis (SBN 215970)  
2 1100 - 4th Street, Suite E, 2nd Floor  
Modesto, CA 95354  
3 Telephone: (209)522-5231  
Facsimile: (209) 526-0632

4 Attorneys for Plaintiff  
5 ERIC CRANFORD

6 SEYFARTH SHAW LLP  
7 Michael A. Wahlander (SBN 260781)  
mwahlander@seyfarth.com  
8 560 Mission Street, 31st Floor  
San Francisco, California 94105  
9 Telephone: (415) 397-2823  
Facsimile: (415) 397-8549

10 SEYFARTH SHAW LLP  
11 Monica Rodriguez (SBN 299026)  
morodriguez@seyfarth.com  
12 2029 Century Park East, Suite 3500  
Los Angeles, California 90067-3021  
13 Telephone: (310) 277-7200  
Facsimile: (310) 201-5219

14 Attorneys for Defendant  
15 US FOODS, INC.

16  
17 UNITED STATES DISTRICT COURT  
18 NORTHERN DISTRICT OF CALIFORNIA

19 ERIC CRANFORD,

20 Plaintiff,

21 v.

22 U.S. FOODS, INC. dba U.S. FOODSERVICE,  
23 INC., a California Corporation; and DOES 1  
through 50,

24 Defendants.

Case No. 3:18-cv-00301-JST

**JOINT STIPULATION TO CONTINUE  
MEDIATION DEADLINE AND  
~~PROPOSED~~ ORDER**

[Assigned to The Honorable Jon S. Tigar,  
Courtroom 9 – 19th Floor]

Complaint Filed: November 27, 2017  
Trial Date: September 30, 2019

1 Plaintiff Eric Cranford (“Plaintiff”) and Defendant US Foods, Inc. (“Defendant”) (collectively  
2 “the Parties”), by and through their counsel, and pursuant to ADR L.R. 6-5 and L.R. 7-12, hereby  
3 stipulate and jointly request that the Court continue the deadline to complete the mediation in this  
4 matter, currently set for October 28, 2018. The basis for the Parties’ request is as follows:

5 1. On March 29, 2018, the Court granted the Parties’ stipulation and request for a referral to  
6 the Northern District of California’s mediation program. (Dkt. No. 15.) The Court set the deadline for  
7 completing the mediation as October 28, 2018. (*Id.*)

8 2. On August 22, 2018, the Court appointed Katherine Clark as mediator. (Dkt. No. 24.)

9 3. In August of 2018, Defendant’s lead counsel, Candice Zee, left Seyfarth Shaw.  
10 Defendant has selected a new lead counsel, Michael A. Wahlander. However, due to Mr. Wahlander’s  
11 need to familiarize himself with the case, the Parties have postponed Plaintiff’s deposition. Due to  
12 scheduling conflicts, the Parties cannot reschedule it until November 2018, at the earliest. To ensure the  
13 mediation is productive, Defendant would like to complete Plaintiff’s deposition before commencing the  
14 mediation.

15 4. These developments prohibit the Parties from rescheduling the mediation by October 28,  
16 2018, the current mediation deadline.

17 5. The Parties have not previously requested a continuance of any deadlines in this case.

18 6. Given that trial is not set to occur until September 2019, the continuance of the mediation  
19 date for this short period will not unduly delay the resolution of this matter. Continuing the mediation  
20 date will also not impact any of the other deadlines currently set in this matter.

21 THEREFORE, the Parties STIPULATE and request as follows:

22 1. That the Court extend the mediation deadline to December 28, 2018.

23 IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD  
24  
25  
26  
27  
28

1 DATED: August 28, 2018

CRABTREE SCHMIDT

2  
3 By: /s/ Michael R. Dennis  
4 Michael R. Dennis

5 DATED: August 28, 2018

6 SEYFARTH SHAW LLP

7  
8 By: /s/ Monica Rodriguez  
9 Michael A. Wahlander  
Monica Rodriguez

10 Attorneys for Defendant  
US FOODS, INC.

11  
12  
13 I hereby attest that all signatories indicated by a conformed signature (/s/) have concurred in the filing of  
14 this document.

15 /s/ Monica Rodriguez

16 Monica Rodriguez

**~~PROPOSED~~ ORDER**

PURSUANT TO STIPULATION, IT IS SO ORDERED.

1. The mediation deadline <sup>in</sup> ~~is~~ this Action is reset to be completed by December 28, 2018.

DATED: August 29, 2018

  
\_\_\_\_\_  
JUDGE JON S. TIGAS